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February 8, 2024

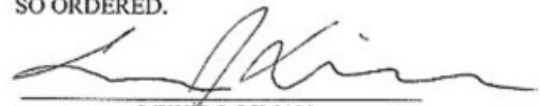
BY ECF AND EMAIL

The Honorable Lewis J. Liman
The Honorable Jessica G.L. Clarke
United States District Judges
Southern District of New York
500 Pearl Street
New York, NY 10007

LimanNYSDChambers@nysd.uscourts.gov
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REQUEST GRANTED.

2/9/2024 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

**RE: *United States v. Cristian Eustate Espinal, 23 Cr. 577 (LJL)*
*United States v. Cristian Eustate Espinal, 23 Cr. 619 (JGLC)***

Dear Judge Liman and Judge Clarke:

I represent Cristian Espinal in the above cases in which the government has identified overlapping facts. In docket number 23 Cr. 577 (LJL), the government has charged Mr. Espinal with narcotics offenses. In docket number 23 Cr. 619 (JGLC), the government has charged Mr. Espinal with possession of child pornography. This letter is respectfully submitted to request that Thomas H. Nooter, Esquire, be appointed as co-counsel in both cases to provide advice about the immigration consequences of these charges.

Mr. Espinal is 20 years old and a citizen of the Dominican Republic. He is married to a United States citizen, and they have an infant daughter. At the time of his arrest, the Department of Homeland Security was processing Mr. Espinal's application for status as a permanent resident. Any decision that Mr. Espinal makes about how to proceed will have consequences for his immigration status. I am not sufficiently knowledgeable about immigration law to advise Mr. Espinal, and he has requested the appointment of a lawyer qualified to provide advice about his immigration status.

Mr. Nooter is a member of the SDNY CJA panel and also has many years of experience representing clients in connection with complex immigration problems,

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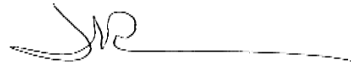
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including applications to defer deportation. I have no such experience. It is respectfully submitted that Mr. Nooter will be able to accomplish this task more efficiently and at less cost than if I attempt this endeavor. Moreover, I do not believe that it is appropriate for me to use Mr. Espinal's immigration issues as a learning experience. Under these circumstances, my professional judgment is that this application complies with section VII.C.4 of this District's CJA Plan (2023).

I am requesting an initial authorization for 7.5 hours of Mr. Nooter's time in each case at the standard CJA hourly rate. If additional hours are needed, we will make a supplemental request. Section VII.C.4 of the CJA Plan authorizes the appointment of two attorneys in a difficult case in the interest of justice, and Mr. Nooter has been appointed as my co-counsel for this same reason in *United States v. Kung*, 20-cr-129 (LJL); *United States v. Toro*, 11-cr-164 (CM); *United States v. Mendoza*, 13-cr-329 (LGS); and *United States v. Coronado*, 16-cr-644 (SHS). It is respectfully submitted that this is a case where the appointment of a second attorney is appropriate and necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JRS', followed by a horizontal line extending to the right.

Jill R. Shellow

cc: Thomas H. Nooter, Esq.